



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA AIRS

Mr James Hosfield
Industrial Wastewater & Solid Waste Engineer
U S Steel Clanton Works
400 State Street
Clanton, PA 15025

Re Notice of Violation

Compliance Evaluation Inspection
September 24 & 25 2013
EPA ID No PA0004498010

Docket No R3-15-NOV-RCRA-20

Dear Mr Hosfield

On September 24 and 25, 2013, the U S Environmental Protection Agency Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") of U S Steel Clanton Works ("Facility" or "Clanton") located at 400 State Street Clanton Pennsylvania, 15025, under the federally authorized Pennsylvania Hazardous Waste Management Regulations ("PAHWMR") and the Resource Conservation and Recovery Act ("RCRA") as amended. 42 U S C Sections 6901 et seq. Based on the September 24 and 25, 2013 CEI, EPA has determined that Clanton has violated regulations under PAHWMR and RCRA. As a result of this determination, EPA is issuing this Notice of Violation ("NOV"). The specific violation(s) are:

- 1 During the September, 2013 EPA CEI, Facility personnel indicated to the EPA inspector that spent gasoline filters are accumulated with the Facility's spent used oil filters, and the waste streams are commingled and sent offsite for disposal. Based on the information gathered during the EPA CEI, the Facility failed to make a waste determination for its spent gasoline filter waste stream in violation of 25 PA Code § 262b, which incorporates by reference 40 C.F.R. § 262.11.
- 2 During the September, 2013 EPA CEI, just outside the Drum Storage Building the EPA inspector observed a cabinet containing spent lamps. Please see Photograph #6 in the Photographic Log of the EPA CEI Report included as Attachment A. At the time of the EPA CEI, the cabinet did not have a label, and it was not closed. Based on the observations made by the EPA inspector during the EPA CEI, the Facility failed to contain universal waste lamps in a closed container in violation of 25 PA Code 262b.1 which references 40 C.F.R. § 273.13(d)(1).
- 3 During the September, 2013 EPA CEI, the EPA inspector observed a satellite accumulation area ("SAA") container located in Room 117 of the Laboratory. Please see Photograph #7 in the Photographic Log of the EPA CEI Report included as Attachment A. According to Facility personnel, the SAA container is used for the accumulation of tar contaminated debris. At the time of the EPA CEI, the container was not labeled with the words "Hazardous Waste" or marked with words describing its contents. Based on

the observations made during the EPA CEI, the Facility failed to mark a hazardous waste SAA container with words to identify its content or with the words Hazardous Waste in violation of 25 Pa Code § 262a 10, which incorporates by reference 40 C.F.R. § 262.34(c)(1)(ii)

A copy of the EPA CEI report, documenting the findings of the inspector, is enclosed as Attachment A for your information

Within **thirty (30) calendar days** of the receipt of this NOV, please submit documentation of any measures that the Facility has taken or is taking to achieve compliance with the violations noted above. If the compliance measures identified are planned or are ongoing, please provide a schedule for when the compliance measures will be completed. If the Facility can provide documentation which shows that EPA's determination of the alleged violation(s) is an error, please submit this information as well. Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$37,500 per day for each violation. In addition, failure to achieve and maintain compliance with the regulations cited in this NOV may be treated as a repeated offense and may constitute a knowing violation of Federal law.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the ones cited in this letter, or past violations in any future enforcement action. Your response to this NOV shall be addressed to

Andrew Ma
U.S. Environmental Protection Agency Region III
Environmental Science Center
701 Mifflin Road
Fort Meade, MD 20755

If you have any questions regarding this matter, please feel free to contact Mr. Andrew Ma at (410) 305 3429

Carol Amend
Carol Amend

Associate Director
Land & Chemicals Division
Office of Land Enforcement

Enclosure

cc

~~25-262a10-520-1000~~
M Gross (PADEP) w/o

April 13, 2015
Date